

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LUCIO MENDEZ,

Plaintiff,

-against-

NOOCH, INC.; RED DOT COM, INC. d/b/a/
Tangerine Restaurant and Café; and SUAN LAY
ONG, a.k.a. Janice Ong,

Defendants.
----- X

ECF Case

Docket Number 07-cv-11174

**DECLARATION OF
AMY CARROLL**

STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

AMY CARROLL, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and an employee of Make the Road New York, Inc., attorneys for Plaintiff in the above-entitled action. I am familiar with all the facts and circumstances in this action.

2. I make this declaration in support of Plaintiff's petition for an award of attorney fees and costs against Defendants Nooch, Inc. and Red Dot Com, Inc.

3. I have spent 9.4 hours working on this matter. I have calculated my hours based on time logs which were contemporaneously recorded by hand and stored in my client's file. I attest that this figure of hours accurately reflects the content of the contemporaneously recorded logs in my files.

4. I am seeking fees for work required of me in this matter and have exercised billing judgment in reducing the number of hours expended.

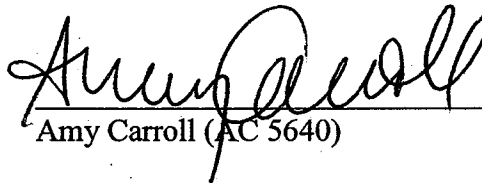
5. I was admitted to practice law in the State of New York in November 2004.

6. Plaintiff submits my hourly rate at \$180 an hour for attorneys with four to six years of experience. Marisol v. Giuliani, 111 F.Supp.2d 381, 386 (S.D.N.Y. 2000).

7. I request an award of \$1,692.00 attorney's fees for my time spent on this case.

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: Brooklyn, New York
May 27, 2008



Amy Carroll (AC 5640)

Plaintiff Attorney Amy Carroll, Esq. of Make the Road New York, Inc.,
Transcription of Contemporaneous Time Records

Date	Hours	Activity
9/8/2007	1.00	Reviewed and commented on draft complaint.
10/5/2007	0.30	Met with Make the Road colleagues to discuss the case
12/10/2007	0.30	Discussed case with Elizabeth Wagoner
12/12/2007	0.30	Discussed service issues with Elizabeth Wagoner.
3/8/2008	0.20	Reviewed letter to J. Stanton
4/18/2008	2.00	Conference before J. Stanton
4/28/2008	0.50	Discussed default with Elizabeth Wagoner.
4/29/2008	0.50	Reviewed draft of default papers
5/1/2008	2.20	Discussed default with Elizabeth Wagoner.
5/23/2008	1.00	Reviewed and discussed default papers.
5/27/2008	1.10	Reviewed and finalized papers. Prepared my affidavit.
	9.40	TOTAL ATTORNEY HOURS FOR AMY CARROLL
	\$1,692.00	TOTAL ATTORNEY FEES REQUESTED BY PLAINTIFFS FOR AMY CARROLL